

COMMONWEALTH OF VIRGINIA



VIRGINIA BEACH CIRCUIT COURT
Civil Division
2425 NIMMO PARKWAY BLDG 10
VIRGINIA BEACH VA 23456
(757) 385-4186

Summons

To: H.P. VENTURES LLC
C/O VB BUSINESS SERVICES LLC
REGISTERED AGENT
500 WORLD TRADE CENTER
101 W MAIN STREET
NORFOLK VA 23510

Case No. 810CL22003190-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Tuesday, July 05, 2022

Clerk of Court: TINA ESGUERRA SINNEN

by


(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: ALBISTON, GEORGE

SERVED BY: H.S.I. - 757.868.5833
REGISTERED AGENT
H.P. VENTURES LLC C/O VB B

494695-

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

SHERRI WHITE,

Plaintiff,

v.

CASE NO.: CL 22 - 3190

H.P. VENTURES, LLC d/b/a MOTOR WORLD,

Defendant.

SERVE:

**Motor World
700 S Birdneck Rd
Virginia Beach, VA 23451**

**H.P. Ventures, LLC
c/o VB Business Services, LLC, Registered Agent
500 World Trade Center
101 W Main Street
Norfolk, Virginia 23510**

COMPLAINT

TAKE NOTICE that the undersigned hereby moves the Circuit Court for the City of Virginia Beach, Virginia, at the Courthouse thereof for a judgment and award against you in the sum of Two Hundred Fifty Thousand Dollars (\$250,000.00) with interest and costs for the following, to-wit:

1. That on the 5th day of July, 2020, the plaintiff, Sherri White, was lawfully and properly on the property of the defendant, H.P. Ventures, LLC d/b/a Motor World (hereinafter Motor World) located at 700 S Birdneck Rd, in the City of Virginia Beach, Virginia.
2. That at the said time and place, the defendant, Motor World, owned, maintained and controlled the aforementioned property as a business.

3. That at the said time and place, the defendant, Motor World, owed a duty to the public to have the property in a reasonably safe condition and to warn the plaintiff of any unsafe condition which the defendant knew or should have known existed on the property. Defendant also had a duty to make and enforce all rules for the safety of their business invitees.

4. That by reason of the negligence of the defendant, Motor World the plaintiff was caused to receive serious and permanent injuries.

5. That these injuries to the plaintiff have caused and will continue to cause and will in the future cause great physical pain, mental anguish and inconvenience; have required the plaintiff to expend large sums of money for medical expenses and will require her to incur medical expenses in the future; have resulted in lost earnings because she is unable to work at her calling and loss of earnings and lessening of earning capacity that she may reasonably be expected to sustain in the future.

6. As a direct and proximate result of plaintiff's injuries she may reasonably be expected to sustain permanent injuries in the future, and the injuries may reasonably be expected to result in disfigurement and deformity with associated humiliation and embarrassment.

WHEREFORE, the Plaintiff prays for a judgment and an award of execution against the Defendant, in the amount of Two Hundred Fifty Thousand Dollard (\$250,000.00), plus prejudgment from July 5, 2020, post judgment interest and Plaintiff's costs in this cause expended.

Plaintiff further demands a **TRIAL BY JURY.**

SHERRI WHITE

By: _____

Of Counsel

Christopher M. Albiston, Esq. (VSB No.: 94637)

George T. Albiston, Esq. (VSB No. 22967)

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